

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
	§	CIVIL ACTION NO. L-24-
v.	§	
	§	
2016 Freightliner Cascadia Tractor	§	
VIN: 3AKGLD65GSHJ8331	§	
Defendant.	§	

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, Plaintiff, by and through the United States Attorney for the Southern District of Texas and the undersigned Assistant United States Attorney, files this action for forfeiture *in rem* against one 2016 Freightliner Cascadia Tractor, VIN: 3AKJGLD65GSHJ8331, hereinafter “Defendant Vehicle”. The United States alleges on information and belief as follows:

Jurisdiction and Venue

1. This Court has jurisdiction pursuant to Title 28, United States Code, Sections 1345 and 1355. The Defendant Vehicle was seized by U.S. Border Patrol agents at the IH-35 Border Patrol Checkpoint located north of Laredo, Texas, and is located in the Southern District of Texas. Accordingly, Defendant Vehicle is within the jurisdiction of this Court.
2. Venue is proper in this Court pursuant to Title 28, United States Code, Sections 1355, 1391(b), and 1395(a) and (b).

Statutory Basis for Forfeiture

8 U.S.C. § 1324(b)

3. Title 8, United States Code, Section 1324(b) provides that “[a]ny conveyance, including any vessel, vehicle, or aircraft, that has been or is being used in the commission of violation of subsection (a), the gross proceeds of such violation, and any property traceable to such conveyance or proceeds, shall be seized and subject to forfeiture.” Title 8, United States Code, Section 1324(a) identifies the transportation or attempted transportation of an alien within the United States for financial gain as an offense for which forfeiture is permissible. The Defendant Vehicle is subject to forfeiture to the United States pursuant to Title 8, United States Code, Section 1324(b) because the Defendant Vehicle was used to and intended to be used to facilitate the transportation of an alien within the United States for financial gain.

4. *Factual Basis for Forfeiture*

5. On May 14, 2024, Kyle Rashaan Williamson (Kyle) was driving the Defendant Vehicle that was hauling a white trailer and approached the I-35 Border Patrol Checkpoint station north of Laredo, Texas. A border patrol canine alerted to the presence of hidden persons or narcotics in the defendant vehicle at the primary inspection lane. Upon further inspection of Defendant Vehicle and the white trailer, agents found thirty-three undocumented aliens who were illegally present in the United States hidden in the trailer.

6. Kyle was arrested and admitted that on May 14, 2024, he made an agreement with at least one other person to transport the undocumented aliens. He was paid, or expected to be paid, for transporting the undocumented aliens with the intent to further their illegal presence in the United States. Additionally, Kyle knew that the persons he was transporting were aliens whose presence in the United States was unlawful.

7. On June 11, 2024, a federal grand jury in the Southern District of Texas, Laredo Division, indicted Kyle Rashaan Williamson, in cause number 5:24-cr-651 for one count alleging a violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (v)(I), conspiracy to transport an undocumented alien within the United States, and two counts alleging a violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), the transport and attempt to transport an undocumented alien within the United States for financial gain.

8. On August 22, 2024, Kyle pleaded guilty to count one of the indictment with a written plea agreement. *See* 5:24-cr-651 at DE. 54. A sentencing date is pending.

9. The factual basis supporting Kyle's guilty plea is incorporated within the written plea agreement and establishes that the Defendant Vehicle was used during the conspiracy to transport thirty-three undocumented aliens illegally present in the United States.

10. By reason of the foregoing recitations, the Defendant Vehicle is subject to an Order of Forfeiture to the United States of America.

NOTICE TO ANY POTENTIAL CLAIMANT

YOU ARE HEREBY NOTIFIED that if you assert an interest in the property subject to forfeiture and want to contest the forfeiture, you must file a verified claim which fulfills the requirements set forth in Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. The verified claim must be filed no later than 35 days from the date this complaint is sent in accordance with Rule G(4)(b).

An answer or a motion under Fed. R. Civ. P. 12 must be filed no later than 21 days after filing the claim. The claim and answer must be filed with the United States District Clerk for the Southern District of Texas and a copy must be served upon the undersigned Assistant United States Attorney at the address provided in this complaint.

PRAYER

WHEREFORE, the United States of America prays:

1. That a warrant of arrest issue against Defendant Vehicle and that Notice of Forfeiture issue advising all persons having an interest in the above-described Defendant Vehicle to appear on the return day of process by filing a claim and answer pursuant to Rule G, Supplemental Rules for Certain Admiralty and Maritime Claims, or as ordered by the Court;
2. That judgment of forfeiture to the United States be decreed against the Defendant Property; and
3. For costs and such other and further relief to which the United States may be entitled.


Respectfully submitted,

ALMADAR S. HAMDANI
United States Attorney

/s/ Mary Ellen Smyth
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VERIFICATION

I, Douglas Lengyel , Supervisory Border Patrol Agent in Laredo, Texas, declare under the penalty of perjury that I have read the foregoing Verified Complaint for Civil Forfeiture, and the facts stated in paragraphs five through eight of the Complaint are based upon my knowledge of the investigation and information obtained from other border patrol agents having personal knowledge of the investigation, and information I obtained in the course of my review of investigative reports. Those facts are true and correct to the best of my knowledge and belief.



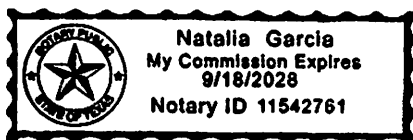
Douglas Lengyel,
Supervisory Border Patrol Agent
Laredo, Texas

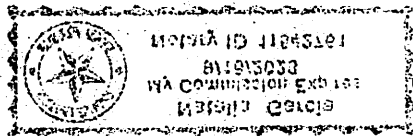
Sworn to and subscribed before me, the undersigned authority, on the 25th day of September, 2024.



Notary Public, State of Texas

My commission expires: 9/18/2028 .





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